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Attorneys for Defendants  
EMBLAZE ONE INC., LIMITLESS X INC.,  
JASPREET MATHER and KENNETH HALLER

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

HARPO, INC. and OW LICENSING  
COMPANY LLC,

Plaintiffs,

v.

EMBLAZE ONE INC., LIMITLESS  
X INC., JASPREET MATHER,  
KENNETH HALLER and JOHN  
DOES 1 - 30

Defendants.

Case No. 2:23-cv-04459-JGB-AS

**EIGHTH STIPULATION TO  
EXTEND DEFENDANTS' TIME  
TO RESPOND TO COMPLAINT;  
DECLARATION OF MICHAEL A.  
DINARDO IN SUPPORT**

Complaint Filed: June 20, 2023  
Current Deadline: April 5, 2024  
Proposed Deadline: April 19, 2024

1 Plaintiffs and Defendants (the “Parties”) hereby stipulate and request that the  
2 Court enter an order extending Defendants’ time to file an answer or other  
3 responsive pleading by fourteen (14) days. This is the eighth and final request.

4 Plaintiffs filed the operative Complaint (“Complaint”) on June 20, 2023 and  
5 served each of the Defendants shortly thereafter, at different times all ranging  
6 within about a week from each other. The responsive pleading to the Complaint  
7 from Emblaze One, Inc., the first Defendant to be served, was due July 24, 2023.  
8 The first request for an order on extension was granted. An additional six requests  
9 were granted due to the Parties’ attempts to settle, as explained in the Parties’ prior  
10 stipulations. The previous extension set the due date to April 5, 2024. The Parties  
11 request an eighth and final extension of two-weeks to April 19, 2024. The Parties  
12 hereby assert that good cause exists for this eighth request, as follows:

- 13 1. The Parties have been and continue to be engaged in settlement  
14 discussions.
- 15 2. The Parties were close to reaching a final settlement, but an issue was  
16 discovered involving a potential third party. Additional time is necessary  
17 for the Parties to further investigate this issue and prepare possible cross-  
18 actions, if necessary.
- 19 3. Defendants have retained new counsel in Lucosky Brookman, LLC and  
20 the undersigned new local counsel.
- 21 4. The Parties believe it is best to begin moving the matter forward. To that  
22 end, Defendants are prepared to file a response to the Complaint (in  
23 addition to continuing to discuss the third-party issue with Plaintiffs), but  
24 require two weeks for their new counsel to familiarize themselves with  
25 the facts of the case and negotiations to date, prepare necessary *pro hac*  
26 *vice* applications, and execute the necessary substitution of counsel.
- 27 5. Plaintiffs and Defendants are therefore in agreement that the date to file  
28 an answer or other pleading responsive to the Complaint be extended

again for all Defendants. The Parties hereby request that the response date for all parties to file a responsive pleading be extended by fourteen (14) days from the current date to April 19, 2024.

The parties respectfully request that the Court so order.

IT IS SO STIPULATED.

Dated: April 4, 2024

By: /s/ Michael A DiNardo  
Michael A. DiNardo, Esq.  
YK LAW LLP

Samuel Blatnick, Esq. (PHV to be filed)  
Anne Melton, Esq. (PHV to be filed)  
LUCOSKY BROOKMAN LLP

Attorneys for Defendants

Dated: April 4, 2024

By: /s/Tamara Carmichael  
Tamara Carmichael, Esq.

Kent J. Schmidt, Esq.  
DORSEY & WHITNEY LLP

Attorneys for Plaintiffs

ATTESTATION PURSUANT TO LOCAL RULE 5-4.3.4(2)(i)

Pursuant to Local Rule 5-4.3.4(2)(i), I, Michael A. DiNardo, attest that all other signatories listed and on whose behalf the filing is submitted concur in this filing's content and have authorized this filing.

/s/Michael A. DiNardo  
Michael A. DiNardo, Esq.

**DECLARATION OF MICHAEL A. DINARDO**

I, Michael A. DiNardo, declare as follows:

1. I am an attorney duly licensed to practice before the courts of the United States, in the Central District of California. I am an attorney representing all Defendants in this matter, including Emblaze One Inc., Limitless X Inc., Jaspreet Mather, and Kenneth Haller, for all matters. I have personal knowledge of the facts set forth herein, and if called as a witness to testify, I could and would competently testify as to the truth of the same, except for those matters stated on information and belief for which I am informed and believe them to be true.

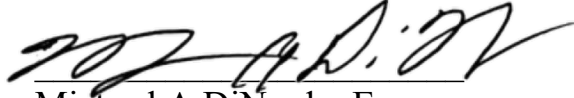
2. I am informed and believe that the parties have been engaged in negotiations since at least July 2023 in regard to settling the above captioned matter. I am further informed and believe that a final settlement amount is still to be negotiated, but recently an additional issue arose related to an advertisement at issue and potential third-party. As previously represented to the Court, I am informed and believe that all parties needed additional time to investigate this issue.

3. Defendants have engaged new litigation counsel to prepare a responsive pleading. Defendants' new litigation counsel needs additional time to submit *pro hac vice* applications, prepare substitutions, and finalize the responsive pleading, as well as consider a third-party action.

4. The requested fourteen (14) day extension will provide the Defendants the time needed to complete the foregoing actions. Defendants do not intend to request any additional extensions. If this final extension is not granted, Defendants would be prejudiced in their ability to complete its substitution of litigation counsel and prepare a responsive pleading. Plaintiff would not be prejudiced by this final fourteen (14) day extension.

1 I declare under penalty of perjury, under the laws of the U.S., that the  
2 foregoing is true and correct.

3 Executed on April 4, 2024, at Los Angeles, California.

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6 Michael A DiNardo, Esq.  
7 Attorney for Defendants  
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**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record, who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system. Any other counsel of record will be served by electronic mail, facsimile transmission and/or first-class mail on this same date.

/s/ Michael A. DiNardo

Michael A. DiNardo